

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

|                               |   |                             |
|-------------------------------|---|-----------------------------|
| UNITED STATES OF AMERICA,     | ) |                             |
|                               | ) |                             |
| Plaintiff,                    | ) | Civ. No.: 1:16-cv-10787     |
|                               | ) |                             |
| v.                            | ) | Judge Jorge L. Alonso       |
|                               | ) |                             |
| JUNG JOO PARK, <i>et. al.</i> | ) | Mag. Judge M. David Wiseman |
|                               | ) |                             |
| <u>Defendants.</u>            | ) |                             |

**JOINT STATUS REPORT**

Pursuant to the Court's minute entry at ECF No. 139, the parties submit the following joint status report on discovery:

1. On November 2, 2020, the Plaintiff United States produced its supplemental disclosures to the Defendants.
2. The United States has taken the virtual depositions of Defendants James Park, Charles Park and Nina Park. The virtual deposition of Nina Park was suspended by Defendants' counsel, but will be completed on November 17, 2020. The parties hope to reach an agreement on the amount of time remaining to complete Ms. Park's deposition.
3. The deposition of Charles Park was held open as the United States waits to receive additional documents responsive to the United States' First Revised Request for Production, and the United States' Second Request for Production of Documents to the Defendants. Additionally, the United States determined that the Answers of Defendants Jung Joo Park and Charles Park to the United States' Second Set of Interrogatories are incomplete. The United States has been in

communication with the Defendants concerning the outstanding discovery issues, and the parties hope to resolve the dispute in the coming weeks.

4. The United States is waiting to receive responses to several third-party subpoenas and will share the documents with the Defendants upon receipt.

5. The United States has rescheduled the virtual deposition of third-party witness Bert Rosenberg for December 4, 2020, for medical reasons.

6. On October 8, 2020, the Defendants conducted the virtual deposition of IRS Agent Dao Chau. The United States is waiting to receive additional documents from the IRS (some of which were discussed during the deposition of Agent Chau), which it will produce to the Defendants upon receipt.

7. Upon receipt of outstanding discovery from the Defendants, the United States will make a determination of whether a settlement conference is appropriate.

8. The parties request a status hearing during the week of December 7, 2020.

Respectfully submitted,

/s/Mary A. Stallings

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/s/Jonathan R. Ksiazek (by email consent  
11/6/20)

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